

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

**ELECTRONIC RECEIPTS DELIVERY
SYSTEMS, LLC,**

Plaintiff,

v.

THE CHILDREN'S PLACE, INC.,

Defendant.

Civil Action No.: 5:20-cv-00775-BYP

TRIAL BY JURY DEMANDED

**UNOPPOSED MOTION TO STAY
ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff Electronic Receipts Delivery Systems, LLC, by and through undersigned counsel and subject to the approval of this Court, hereby files this Unopposed Motion to Stay All Deadlines and Notice of Settlement, and in support thereof, respectfully shows the Court as follows:

All matters in controversy between Plaintiff and Defendant The Children's Place, Inc. have been settled in principle. The parties are in the process of memorializing the terms of a written settlement agreement. The parties anticipate that they will be able to perform such terms within forty-five (45) days. Accordingly, Plaintiff respectfully requests that the Court grant a stay of the proceedings between the parties, including all deadlines, until August 10, 2020. Defendant is unopposed to the relief requested herein.

Good cause exists for granting this Unopposed Motion, as set forth above. The motion is not filed for purposes of delay but so that justice may be served.

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff conferred with Defendant about the issues presented here. Defendant indicated that it was not opposed to the relief sought herein.

Dated: June 29, 2020

Respectfully submitted,

SAND, SEBOLT & WERNOW CO., LPA

/s/ Howard L. Wernow

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy has been electronically filed using the CM/ECF filing system, which automatically sends email notifications to all counsel of record and which will permit viewing and downloading of same from the CM/ECF system on June 29, 2020.

/s/ Howard L. Wernow

Howard L. Wernow